

UNITED STATES DISTRICT COURT

Middle DISTRICT OF Tennessee

UNITED STATES OF AMERICA
V.

CRIMINAL COMPLAINT

NATHANIEL ROBERTS, TAVORIS ROBERTS,
PATRICK BULLOCK, SHERMAIN AIDEN
and JOHNNY TURRENTINE

Case Number: 10-3039 MB

(Name and Address of Defendant)

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. From on or about June 2008 to on or about July 2010 in Davidson county, in the Middle District of Tennessee defendant(s) did,

(Track Statutory Language of Offense)

conspire to commit sex trafficking by force, fraud, or coercion,

in violation of Title 18 United States Code, Section(s) 1591 and 1594

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:
Official Title

Continued on the attached sheet and made part of the complaint:



Jonathan H. Hendrix
Signature of Complainant

Jonathan Hendrix

Printed name of Complainant

Sworn to before me and signed in my presence

Date
Joe B. Brown

21 Oct 2010

Name of Judge

United States Magistrate Judge

Title of Judge

Nashville

Tennessee

City

State

Joe B. Brown
Signature of Judge

AFFIDAVIT OF JONATHAN HENDRIX

I, Jonathan Hendrix, being duly sworn on oath, states as follows:

I am a Special Agent for the Homeland Security Investigations and have been employed as an Homeland Security Investigations Special Agent since 2002. The Homeland Security Investigations is responsible for enforcing federal criminal statutes involving sex trafficking under Title 18, United States Code, Sections 1951 and 1954.

I am a graduate of the Federal Law Enforcement Training Center's Criminal Investigator Training Program and the United States Customs Service Basic Enforcement School, where I received training in the investigation of sex trafficking. During the course of my duties I have been involved in sex trafficking investigations.

In this capacity I have become familiar with the following federal statutes:

Sex Trafficking by Force, Fraud or Coercion, 18 U.S.C. § 1591(a), which makes it unlawful for anyone to knowingly recruit, entice, harbor, transport, provide, obtain, or maintain by any means a person, knowing or in reckless disregard of the fact, that means of force, fraud or coercion will be used to cause the person to engage in a commercial sex act.

Definitions as set forth in 18 U.S.C. § 1591(e), which defines coercion as threats of serious harm to or physical restraint against any person or any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person and commercial sex act as any sex act on account of which anything of value is given or received by any person.

The General Provisions Section, 18 U.S.C. § 1594(c) which states that anyone who conspires with another to violate § 1591 shall be punished in the same manner as a completed violation of that section.

This affidavit is submitted in support of a Criminal Complaint for the arrests of **NATHANIEL ROBERTS, TAVORIS ROBERTS, PATRICK BULLOCK, SHERMAIN AIDEN**, and **JOHNNY TURRENTINE** for the following offense: Beginning from in or around June 2008, through in or around July 2010, in the Middle District of Tennessee **NATHANIEL ROBERTS, TAVORIS ROBERTS, PATRICK BULLOCK, SHERMAIN AIDEN**, and **JOHNNY TURRENTINE** did conspire to commit sex trafficking by force, fraud, or coercion, in violation of Title 18, United States Code, Sections 1594 and 1591.

The following information contained in this affidavit is based on my training, experience, my personal participation in this investigation and information provided to me by other law enforcement officials. Unless otherwise indicated, where I have referred to written or oral statements, I have summarized them in substance and in part, rather than verbatim. Not all of the facts of the investigation known to me are contained herein, only those necessary to establish probable cause for the arrest of **NATHANIEL ROBERTS, TAVORIS ROBERTS, PATRICK BULLOCK, SHERMAIN AIDEN**, and **JOHNNY TURRENTINE**.

INVESTIGATION

Law enforcement officers have identified the leader of this organization is **NATHANIEL "NAY NAY" ROBERTS**.

On December 16, 2004, **NATHANIEL ROBERTS** was arrested by Columbia Police Department for the offense of promoting prostitution. **NATHANIEL ROBERTS** pled guilty to misdemeanor promoting prostitution May 02, 2005, in Maury County General Sessions Court and was sentenced to supervised probation.

On October 23, 2007, **NATHANIEL ROBERTS** was again arrested for promoting prostitution in Davidson County by Metro Nashville Police Department. On February 04, 2008, **NATHANIEL ROBERTS** pled guilty to attempted promoting prostitution and received a suspended sentence.

On July 15, 2008 **NATHANIEL ROBERTS** was arrested by Metro Nashville Police for Promoting Prostitution in Davidson County. **NATHANIEL ROBERTS** pled guilty on September 25, 2008, to attempted promoting prostitution and received a suspended sentence.

Law enforcement officers have conducted research and have not found any employment record in the State of Tennessee for **NATHANIEL ROBERTS** for the past twelve months. Law enforcement officers have also observed on Myspace.com, **NATHANIEL ROBERTS** in a photograph as "nay nizzle" (Nay Nay) and observed his occupation was listed as "pimp," and yearly income of over \$100,000 per year. This was observed in early 2010.

CONFIDENTIAL SOURCE 1

During an interview with CS 1 in September 2008, CS 1 stated around the age of eighteen in June of 2008, she was solicited by Nay Roberts (**NATHANIEL ROBERTS**) to become a prostitute. This was done at **NATHANIEL ROBERTS'S** residence, then on Midway Avenue, Columbia, Tennessee. Approximately two months later, she agreed to become one of his prostitutes and started to work for him. A week after **NATHANIEL ROBERTS** began prostituting CS 1, they moved to a trailer on Mapleashe Avenue, in Columbia. CS 1 says they were involved at that point in a relationship. CS 1 described the relationship as very violent and controlling, often leaving her injured by **NATHANIEL ROBERTS**. CS 1 stated **NATHANIEL ROBERTS** promoted her prostitution services through the internet through Craigslist and Backpage using false names. This information was corroborated by law enforcement officers by obtaining adult escort ads from Backpage.com through subpoena. Additionally, **NATHANIEL ROBERTS** was found to be in possession of a computer containing photographs used to promote the prostitution of CS 1 during the execution of a search warrant on May 25, 2010. CS 1 further stated that when she moved in with **NATHANIEL ROBERTS** she had her own phone, but it disappeared. **NATHANIEL ROBERTS** replaced the phone with one he (**NATHANIEL ROBERTS**) had.

From the beginning of their working relationship, CS 1 stated that **NATHANIEL ROBERTS** dictated the rules that governed her life. She was soon completely controlled by **NATHANIEL ROBERTS**, being beaten by him for not answering the calls from men wanting her prostitution services. CS 1 describes his violence as "often," whenever he became angry with her. She further explained that there were times she was hospitalized for her injuries, but lied to

the medical personnel and police officers about how it happened, fearing **NATHANIEL ROBERTS**. She confirmed a report taken by a Sheriff's Deputy was false, and that **NATHANIEL ROBERTS** had beaten her that night causing severe injury to her face and head. CS 1 described **NATHANIEL ROBERTS** kicking her in the torso while she was on the ground, causing her lung to collapse. Medical records have been received by law enforcement officers, confirming her collapsed lung on May 10, 2009. At the time of the interview, CS 1 stated the latest assault occurred at **NATHANIEL ROBERTS'S** house at 324 West 9th Street, Columbia, Tennessee, when she went to stay with him for a couple days. During this time, CS 1 stated she was choked by **NATHANIEL ROBERTS** to the point of unconsciousness. The choking was eventually stopped by another male. CS 1 stated this incident of abuse occurred because she (CS 1) and **NATHANIEL ROBERTS'S** girlfriend, went to work and had a sexual encounter with a "trick" (patron of sexual services) where she (CS 1) charged more than usual and did not inform **NATHANIEL ROBERTS** of the extra money she made. When CS 1 and **NATHANIEL ROBERT'S** girlfriend arrived home, **NATHANIEL ROBERTS'S** girlfriend told **NATHANIEL ROBERTS** about the extra money, which prompted the assault, a display of his force and control over CS 1.

CS 1 explained that a large number of women worked for **NATHANIEL ROBERTS** over the years, and CS 1 identified several of these women. This information was corroborated by law enforcement officers through multiple witness interviews.

According to CS 1, the prices were set by **NATHANIEL ROBERTS** and the standard was one hundred fifty dollars (\$150) for one-half hour and never less, going up to two hundred (\$200) for an hour. These prices are consistent with the prices provided by another identified

victim utilized by **NATHANIEL ROBERTS** in the past. CS 1 says she worked a minimum of three “tricks” a week, sometimes several a day. She further stated all money went to **NATHANIEL ROBERTS** for the work she (CS 1) did. CS 1 explained that the arrangement was that if the prostitute lived with **NATHANIEL ROBERTS**, he took all of the money. If the prostitute did not live with **NATHANIEL ROBERTS**, he kept half.

CS 1 stated that on numerous occasions **NATHANIEL ROBERTS** would call meetings to be held at a parking garage in Nashville. At these meetings, **NATHANIEL ROBERTS** would update the victims and their pimps of any information **NATHANIEL ROBERTS** deemed critical to the promotion of his criminal enterprise. After the meeting, the victims waited for calls from men for sexual services.

A state search warrant was signed by Maury County Circuit Judge Stella Hargrove on May 24, 2010. On May 25, 2010, law enforcement officers executed the search warrant at **NATHANIEL ROBERTS’S** residence at 324 West 9th Street, Columbia, Tennessee. During the search, officers recovered tasers, computers, cellular telephones, documents, photographs, approximately \$7,426, vehicles, and gang art work. The computers and cellular telephones contained photographs and information attributable to **NATHANIEL ROBERTS’S** criminal enterprise.

During the search, **NATHANIEL ROBERTS** was present, and agreed to speak to law enforcement officers after he was advised of his *Miranda* Rights. **NATHANIEL ROBERTS** stated he had no reportable income since 2005, and claimed he sustained himself by drawing airbrush and tattoo design. **NATHANIEL ROBERTS** denied his current girlfriend’s involvement in prostitution; however, he did not deny the other women’s involvement.

NATHANIEL ROBERTS further admitted that he had prostituted CS 1 until she left at the outset of his relationship with his current girlfriend which began six months prior. He claimed that he had stopped prostituting women when he began dating his current girlfriend.

CONFIDENTIAL SOURCE 2

On April 15, 2010 law enforcement officers spoke with CS 2 concerning her involvement in prostitution and her victimization by persons in the Wolf Pack organization. Concerning **SHERMAINE AIDEN**, CS 2 stated that she met **AIDEN** in spring of 2009. She knew him by the nick name of "Tink". She was also introduced to "Sug," (short for "sugar") who is **TAVORIS ROBERTS**. CS 2 soon moved in with **NATHANIEL "Nay-Nay" ROBERTS**, on Mapleshe Avenue. She says they (CS 2 and **AIDEN**) went there because they had nowhere else to go. While living there, **AIDEN** was told by **NATHANIAL ROBERTS** that he (**AIDEN**) should "work" or prostitute CS 2.

CS 2, then at 19 years of age, began prostituting at **AIDEN'S** direction. CS 2 stated that at that time **AIDEN** was addicted to drugs and alcohol. During the course of their relationship through December 2009, she (CS 2) says it was extremely difficult and she was beaten by **AIDEN** between 20 and 30 times. CS 2 recalled being beaten because she was labeled a "smart mouth." CS 2 also recalled she received a number of the beatings because she failed to answer the phone for a patron of prostitution. CS 2 stated she posted her profile on "Backpage and Craigslist" soliciting prostitution. CS 2 explained this was how she received her calls to have paid sexual encounters. CS 2 stated she used to turn the phone on silent or hide the calls because she did not want to prostitute, but **AIDEN** forced her to so he (**AIDEN**) could financially support

the prostitutes under his control, as well as to support his own habits. CS 2 stated if **AIDEN** found that she (CS 2) had ignored a call, **AIDEN** would get physical with her and harm her and she (CS 2) described several physical encounters in which **AIDEN** slammed her (CS 2's) head against a window, brick wall, and into a dumpster; all causing injury. According to CS 2, **AIDEN** was so controlling that he (**AIDEN**) took her (CS 2) to the sexual encounters every time, at least 100 times in the last six months of 2009.

After the forced encounters, she (CS 2) immediately had to give proceeds of the sexual encounter to **AIDEN** who had convinced her (CS 2) she was not responsible, and the money had to go to him (**AIDEN**). CS 2 stated she was expected to answer the phone when the "tricks" called. CS 2 estimated at a low figure between 100 and 200 sexual encounters while working for **AIDEN**. CS 2 also stated she (CS 2) made one hundred fifty dollars (\$150) for one-half hour and two hundred (\$200) for an hour, base rate, and could charge more; as much as three hundred fifty dollars (\$350) if she wanted, depending on the service provided. Regardless, the money still went to **AIDEN**. CS 2 stated these prices were set by **NATHANIEL ROBERTS**.

CS 2 further stated that she (CS 2) is in fear of **AIDEN**. CS 2 witnessed a conversation between **AIDEN** and an unidentified victim on April 14, 2010, where **AIDEN** told her (CS 2) over the phone, he "would kill her." Sometime in November 2009, CS 2's father called the Murfreesboro Police because she told her father that **AIDEN** was in fact holding her (CS 2) against her will.

CS 2 gave **NATHANIAL ROBERTS'S** common mantra: "Hoes get paid, Bitches get laid, and Tricks spend money." CS 2 explained this as "Hoes" are prostitutes; "bitches" are women who have sex with pimps, or anyone else without compensation; and "tricks" being a

person who pays for the sexual encounter. CS 2 also explained that **NATHANIEL ROBERTS** deemed himself “the mastermind of the operations” and oversaw all of the prostitutes that worked for **TAVORIS ROBERTS, AIDEN, BULLOCK,** and **JOHNNY TURRENTINE.** Even though a woman may work for one of these other men, the pimp may have to pay **NATHANIEL ROBERTS** if the female prostitute had an encounter with a paying customer who was a former or present customer of one of his (**NATHANIEL ROBERTS**) prostitutes.

CS 2 explained that **PATRICK BULLOCK** was not as controlling as **AIDEN**, but she still gave all the money to him (**BULLOCK**) for the “tricks” she did. CS 2 further stated that **BULLOCK** would not allow her to be messed up when prostituting, telling her it was bad for business. She (CS 2) explains her work for **BULLOCK** started in December 2009, and has since evolved into a relationship with him (**BULLOCK**) although she works nightly. CS 2 stated she posted her profile on "Backpage and Craigslist" just as she had while working for **AIDEN.** This was how she (CS 2) received her calls to have paid sexual encounters.

CS 2 stated several girls work for **BULLOCK**, to include CS 3, CS 4, and others, most of whom live with them (CS 2 and **BULLOCK**) at 908 Twin Oakes Drive in Murfreesboro, Tennessee. CS 2 indicated she has done over one hundred services of prostitution working for **BULLOCK** and this was a low estimation.

CS 2 further advised that **BULLOCK** has a black handgun in the residence and used the handgun during an altercation with other persons recently at the residence.

COOPERATING SOURCE 3

On May 25, 2010, law enforcement interviewed CS 3. CS 3 stated that she lived at 324 West 9th Street with **NATHANIEL ROBERTS** and his girlfriend. CS 3 related that she was currently involved in the illegal business of prostitution. CS 3 advised law enforcement that she was the girlfriend of **TAVORIS ROBERTS** and that **TAVORIS ROBERTS** was her pimp. CS 3 estimated that she had made approximately \$2,000 in the last month by performing acts of prostitution. CS 3 stated that she made this money for **TAVORIS ROBERTS** as he was her pimp. Law enforcement officers seized \$532 cash from **TAVORIS ROBERTS** at the residence on that same day pursuant to the search warrant. CS 3 has been active in the prostitution business under the direction and control of **TAVORIS ROBERTS** since 2008. CS 3 stated that she used Backpage.com to advertise her prostitution services. This has been substantiated through independent investigation. CS 3 stated that she has direct and specific knowledge that CS 2, CS 4, and others were all working as prostitutes for **BULLOCK**. CS 3 further stated that CS 1 and another individual are currently working as prostitutes for **TURRENTINE**. CS 3 has personally witnessed an individual give \$1,500 from prostitution directly to **TURRENTINE**. CS 3 has personally witnessed another individual give money directly to **AIDEN**, which she knew to be proceeds of prostitution.

In a second interview on June 23, 2010, law enforcement officers conducted another interview with CS 3. This interview took place at the Maury County Sheriff's Office in Columbia, Tennessee. CS 3 had come into the Sheriff's office of her own free will. While discussing details about the prostitution activity that she (CS 3) had been involved in, it was learned that she (CS 3) had been hospitalized on June 17, 2010, as a result of an assault at the

hands of **TAVORIS ROBERTS**. CS 3 provided law enforcement officers with hospital records confirming her hospitalization. These records detailed fractures in CS 3's cheek bone and a sinus bone in her face. CS 3 stated in a sworn statement that "He beats me up because he says that I disrespect him and that I have a smart mouth. I am not his girlfriend, I am his "ho", but I live with him and he controls what I do. He does not let me out of the house unless I am going to make money by doing prostitution." As a result of this, law enforcement officers arrested **TAVORIS ROBERTS** for Aggravated Assault.

During this interview, CS 3 also stated "[h]e abuses just about daily, physically or mentally, and says most of the time its because of my mouth. All the money I've made in prostitution for the last three years has been given to sugar [**TAVORIS ROBERTS**] every time. I think I've made about nine hundred dollars a week for the last three years."

During the sworn statement, CS 3 stated all his (**NATHANIEL ROBERTS'S**) money comes from the prostitution of two individuals identified by CS 3. **NATHANIEL ROBERTS** refers to all of the prostitutes and pimps he does business with as the "Wolf Pack." According to CS 3, **NATHANIEL ROBERTS** calls this clique of "pimpin and hoin'."

According to CS 3, **TURRENTINE** has one girl that worked for him as a prostitute at that time, CS 1. CS 3 stated **TURRENTINE** does not have a job. Records check conducted by Tennessee Bureau of Investigation failed to locate any employment information in the State of Tennessee for **TURRENTINE** for the past year.

CONFIDENTIAL SOURCE 4

During the months of September and October 2010, law enforcement officers met with CS 4 and questioned her as to her knowledge of the Wolf Pack organization.

CS 4 advised that in 2007 she (CS 4) was introduced to **TAVORIS ROBERTS** through her friend, CS 3. They (CS 4 and CS 3) met at **BULLOCK'S** house in Columbia, at Malibu Canyon Drive. CS 4 stated **TAVORIS "Sugar" ROBERTS** lived with **BULLOCK**. CS 4 stated he (**TAVORIS ROBERTS**) talked her (CS 4) into prostitution and she (CS 4) lived with him (**TAVORIS ROBERTS**) in Columbia at **BULLOCK'S** residence. CS 4 stated she was trafficked by **TAVORIS ROBERTS** for approximately one month. During that month, she (CS 4) was only prostituted twice, but according to CS 4, both times the work was found and arranged by **NATHANIAL ROBERTS**.

During her trafficking, **NATHANIAL ROBERTS** posted her on web sites for escorts. During the time she (CS 4) was working for **NATHANIEL ROBERTS**, she (CS 4) was required to give all money she earned from prostitution to **NATHANIAL ROBERTS**. During the time she (CS 4) was working for **TAVORIS ROBERTS**, she (CS 4) was required to give all money she earned from prostitution to **TAVORIS ROBERTS**.

CS 4 also stated she was with CS 1 on one of the nights that CS 1 was assaulted by **NATHANIAL ROBERTS**, requiring medical attention.

CS 4 stated she was trafficked by **BULLOCK** continuously, three times a day, every day of the week. CS 4 stated the low figure for her earnings was two hundred dollars (\$200) for an encounter with a customer. CS 4 stated all of the money from the prostitution went to

BULLOCK. CS 4 stated that **BULLOCK** was very violent with her, often beating her and harming her.

CS 4 recalled regular meetings called by **NATHANIEL ROBERTS** in which **BULLOCK** would meet him (**NATHANIEL ROBERTS**) in Nashville. During the meetings, **NATHANIEL ROBERTS** discussed police activity and the fears **NATHANIEL ROBERTS** had of law enforcement. **NATHANIEL ROBERTS** also gave recommendations of how to avoid law enforcement. **NATHANIEL ROBERTS** also discussed money at these meetings. CS 4 stated that through her time with **BULLOCK**, she (CS 4) became very well acquainted with the girls who worked for the other pimps.

RECORDS FROM BACKPAGE


Through the course of this investigation, law enforcement officers have learned that **NATHANIAL ROBERTS, TAVORIS ROBERTS, BULLOCK, AIDEN,** and **TURRENTINE** commonly use internet-based advertisements on Backpage.com to advertise the services of prostitutes that are under their control. On June 14, 2010 in pursuit of this investigation, law enforcement officers served a Tennessee State Judicial subpoena on Backpage.com for the suspects. Because of the fact that the victims identified in this investigation are often instructed to post advertisements of themselves on Backpage.com, law enforcement officers also requested records concerning the victims of this case. By reviewing these records, law enforcement officers have observed that **NATHANIAL ROBERTS, TAVORIS ROBERTS, BULLOCK, AIDEN,** and **TURRENTINE** have all posted female victims on Backpage.com for the purpose of prostitution. Many of these postings display female

victims in little or no clothing. These advertisements have very suggestive language that, based on your Affiant's training and experience, are undoubtedly advertisements for prostitution services.

These records obtained from Backpage.com also list the exact dates that these postings were made, as well as the email addresses linked to the accounts that posted the records. A large portion of these advertisements list **NATHANIAL ROBERTS** as the customer paying for the advertisement with the email address of "naynizzle123@yahoo.com." Law enforcement officers have confirmed from interviews and from the examination of records that the email address of "naynizzle123@yahoo.com" is the email address used by **NATHANIAL ROBERTS**.

CONCLUSION

Therefore, considering the foregoing, your Affiant has probable cause to believe that **NATHANIEL ROBERTS, TAVORIS ROBERTS, PATRICK BULLOCK, SHERMAIN AIDEN, and JOHNNY TURRENTINE** are involved in an conspiracy to commit sex trafficking by force, fraud, or coercion, in violation of Title 18, United States Code, Sections 1594 and 1591 in and around the Middle District of Tennessee.


Jonathan Hendrix
Senior Special Agent
Homeland Security Investigations

Subscribed and Sworn to

before me this ____ day of October, 2010.

The Honorable Joe B. Brown
United States Magistrate Judge
Middle District of Tennessee